

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHELE CATALANO,)
v.)
Plaintiff,)
) Civil Action No.
) 05-11729 JLT
BRIDGE OVER TROUBLED)
WATER, INC.,)
Defendant.)
)

UNOPPOSED MOTION FOR ADMISSION OF HILLARY SCHWAB *PRO HAC VICE*

NOW comes the undersigned, a member of the bar of this Court and, pursuant to Local Rule 83.5.3(B) of the United States District Court for the District of Massachusetts, respectfully moves this Court to admit Hillary Schwab, Esq. of the firm Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C. *pro hac vice* counsel for the plaintiffs in the above-captioned matter.

In support of this motion, the undersigned states:

1. I am a member in good standing of the bar of this Court, and I have filed an appearance in the above-captioned matter.
2. I move for the admission *pro hac vice* of Ms. Schwab to appear before this Court as co-counsel of record, and to participate in all proceedings.
3. As evidenced by her attached Certificate, Ms. Schwab is a member in good standing of the Bars of the State of New York and the State of Wisconsin and in every other jurisdiction in which she has been admitted to practice; there are no disciplinary proceedings pending against Ms. Schwab as a member of the bar in any jurisdiction; and Ms. Schwab is familiar with the local rules of this Court.

WHEREFORE, undersigned counsel respectfully requests that this Court grant leave for Hillary Schwab to appear before the Court in this matter *pro hac vice*.

Respectfully submitted,

MICHELE CATALANO,

By her attorneys,

s/Harold L. Lichten
Harold L. Lichten, BBO #549689
PYLE, ROME, LICHTEN, EHRENBERG
& LISS-RIORDAN, P.C.
18 Tremont Street, 5th Floor
Boston, MA 02108
(617) 367-7200

Dated: December 6, 2005

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1, I certify that I conferred with counsel for the Defendant regarding the subject of this motion and that she informed me that Defendant assents to the motion.

s/Hillary Schwab
Hillary Schwab, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2005, I caused a copy of this document to be served by electronic filing and first-class mail on Joan Ackerstein, Esq., Jackson Lewis LLP, 75 Park Plaza, Boston, MA 02116.

s/Hillary Schwab
Hillary Schwab, Esq.

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)

CERTIFICATE OF HILLARY SCHWAB

I, Hillary Schwab, an attorney licensed to practice in the State of New York and the State of Wisconsin, hereby certify as follows:

1. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice, to wit, the Bar of the State of New York, the Bar of the State of Wisconsin, and of the following federal courts: the United States Courts of Appeals for the Third, Fifth, Seventh, and Eleventh Circuits; and the United States District Courts for the Southern District of New York, the Eastern District of Wisconsin, and the Western District of Wisconsin.

2. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

3. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Boston, Massachusetts, this 6th day of December, 2005.

s/Hillary Schwab
Hillary Schwab, Esq.